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Attorneys for Defendant: MUHAMMAD MUDASSAR ANWAR

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMAZON.COM, INC et al,

Plaintiff,

VS.

MUHAMMAD MUDASSAR
ANWAR, an individual, TECH DRIVE
PVT, LLC, a New York Limited
Liability Company, et al.

Defendants.

Case No.: 3:23-cv-05580-TLT-RI

**MUHAMMAD MUDASSAR
ANWAR DECLARATION IN
SUPPORT OF MOTION TO
SETASIDE DEFAULT AND
DISMISS CASE FOR LACK OF
PERSONAL JURISDICTION**

Hearing

Date: February 25th, 2025

Time: 2:00 p.m.

Place: 450 Golden Gate Avenue,
Courtroom #9 (19th Floor) San
Francisco, CA 94102.

[Filed concurrently with notice of motion, proposed order and memorandum of points and authorities]

**MUHAMMAD MUDASSAR ANWAR DECLARATION IN SUPPORT OF
MOTION TO SETASIDE DEFAULT AND DISMISS CASE FOR LACK OF
PERSONAL JURISDICTION**

1. I, MUHAMMAD MUDASSAR ANWAR, hereby declare as follows:

I am the defendant named in this action. I make this declaration based on personal knowledge of the information contained in this declaration and, if called upon to do so, could competently testify to the information set forth in this declaration.

2. I live in Scarsdale, New York and have for all times relevant to this complaint, for the last 7 years.

3. I am the owner of Tech Drive PVT, also named as a Defendant in this case.

The company is located in New York at all relevant times, but is now closed.

4. I deny the allegations made in the complaint.

5. I have never had any offices in California.

6. I do not do any business targeted to California.

7. I did not register the domain name they are accusing me

8. I do not own any real estate or other property in California.

9. I have never had any employees, or agents in California.

10.I have never had any businesses running in California.

11.I never created any websites as Plaintiff alleges, a

California address as Plaintiff claims.

.I had no reason to believe I could be s

12.I had no reason to believe I could be sued in California, and it would cause me great financial hardship to be forced to litigate this case in California.

13. I am not the guilty party in this case as I was a victim of identity theft.

14. I filed a police report with the New Rochelle police department. See attached **Exhibit “1”** for a true and correct of the police report.

15. I have never owned a 408-area code phone number and did not add this to any website.

16. The reasons I did not hire an attorney earlier were that I was innocent and also in extreme financial hardship and I could not afford to hire an attorney to represent me.

I declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and accurate.

DATED this 10th day of 2025 at Scarsdale, New York.

DECLARANT MUHAMMAD MUDASSAR ANWAR

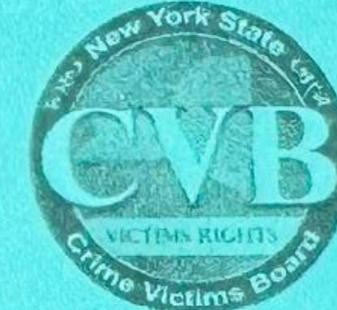
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475 North Avenue
New Rochelle, New York 10801

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The logo for the Crime Victims Board of New York State. It features a circular design with "New York State" at the top and "Crime Victims Board" at the bottom. In the center, the letters "CVB" are prominently displayed, with "VICTIMS RIGHTS" written below them.

Albany
1 Columbia Circle
Suite 200
Albany, NY 12203-6383
(518) 457-8727

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POLICE DEPARTMENT

of your report,

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654-2235

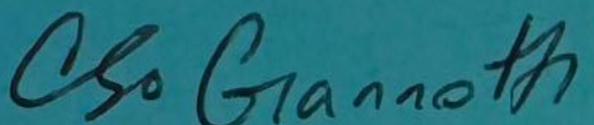
Report available

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POLICE COMMISSIONER



POLICE OFFICER

PO Bird
914-654-2248

NEW ROCHELLE POLICE DEPARTMENT
POLICE – FIRE – AMBULANCE

NON EMERGENCIES

- GENERAL INVESTIGATIONS UNIT**
Homicides, rapes, assaults, robberies
- PROPERTY THEFT UNIT**
Burglaries, stolen property, criminal mischief, etc.
- COMMUNITY POLICING**
Youth Problems
Community Resource Coordinator
- RECORDS UNIT**
Incident Reports
Accident Reports
- PROPERTY CLERK**
- FORENSIC UNIT**
- INTERNAL AFFAIRS UNIT**
Employee complaints/ compliments
- DISTRICT ATTORNEY'S OFFICE**